

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DAVID CATANZARO,)	CASE NO.: 1:13-CV-00996
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
vs.)	<u>MOTION FOR EXTENSION OF</u>
)	<u>TIME WITHIN WHICH TO ANSWER</u>
SEAMAN GARSON LLC/LLP, ET AL.,)	<u>OR OBJECT TO DISCOVERY</u>
)	
Defendants.)	

Now comes Defendant, Wayne D. Porter, Jr., by and through counsel, and hereby move this Honorable Court pursuant to Fed.R.Civ.P. 6(b) for an enlargement of time of thirty (30) days from February 19, 2014, within which to answer or object to Plaintiff's First Set of Interrogatories, Requests for Production of Documents and Requests for Admission. Counsel states that Defendant requires additional time in order to properly prepare the answers or objections to Plaintiff's Discovery. Defendant has previously been granted no enlargements of time for a total of – 0 – days and certifies that this motion is not interposed for purposes of harassment or delay.

In view of the foregoing, Defendant Wayne D. Porter, Jr., respectfully requests that this Honorable Court grant him an extension of time of thirty (30) days through and including March 21, 2014, within which to answer or object to Plaintiff's First Set of Interrogatories, Requests for Production of Documents and Requests for Admission. Counsel for Plaintiff, was contacted on February 11, 2014, and has no objection to said extension.

Respectfully submitted,

MAZANEC, RASKIN & RYDER Co., L.P.A.

s/Thomas S. Mazanec

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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2014, a copy of the foregoing Motion for Extension of Time Within Which to Answer or Object to Discovery was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Thomas S. Mazanec

THOMAS S. MAZANEC (0009050)

Counsel for Defendant Wayne D. Porter, Jr.

CNAN-130109/Leave to Ans Discovery-ND